

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JACK JARRELL, MICHAEL PFIEFFER, and	)	
IRON WORKERS OF TENNESSEE VALLEY	)	
AND VICINITY ANNUITY FUND,	)	
	)	Civil Action No. 3:22-cv-00750
Plaintiffs,	)	
	)	<i>Judge William L. Campbell, Jr.</i>
	)	<i>Magistrate Judge Jeffery S. Frensley</i>
v.	)	
	)	
ROY BLACKWELL ENTERPRISES, INC., and	)	
ROY BLACKWELL,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF DEFAULT JUDGMENT BY THE COURT**

The Clerk entered default against Roy Blackwell Enterprises, Inc. (“the Company”) and Roy Blackwell (“Blackwell”) (collectively “Defendants”) in this action on December 22, 2022 (Docket Entry No. 13).

Pursuant to Fed. R. Civ. P. 55(b)(2), Jack Jarrell and Michael Pfeiffer (“Trustees”) and Iron Workers of Tennessee Valley and Vicinity Annuity Fund (“Plaintiff Fund”) move the Court to enter default judgment against Defendant and Blackwell. The amount of the judgment requested is \$5,636.50.

The default judgment should also convert the preliminary injunction (Docket Entry No. 19) to a permanent injunction.

In support of this motion, Trustees and Plaintiff Fund submit the Declaration of counsel, which authenticates the amount of \$3,402 for attorney fees and costs, and the supplemental Declaration of Kimberly Reynolds affirming the outstanding amount of \$2,234.50 for contributions, penalties and interest, *see* Exhibit B to Declaration of Kimberly Reynolds in

Support of Plaintiffs' Motion for Entry of Default Judgment by the Court. This is a total of \$5,636.50.

A supporting memorandum demonstrates default judgment should be entered under Fed. R. Civ. P. 55(b)(2). The suggested form of an order granting the judgment is filed simultaneously for convenience of the Court.

Respectfully submitted,

/s/ R. Jan Jennings  
R. Jan Jennings, BPR No. 1536  
Karla M. Campbell, BPR No. 027132  
**BRANSTETTER, STRANCH & JENNINGS, PLLC**  
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Nashville, Tennessee 37203  
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Email: karlac@bsjfirm.com

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been served via First-Class U.S. Mail, postage pre-paid, to:

Roy Blackwell Enterprises, Inc.  
250 Menefee Street  
Covington, TN 38019-2632

Roy Blackwell  
Roy Blackwell Enterprises, Inc.  
250 Menefee Street  
Covington, TN 38019-2632

Dated this 25th day of April 2023.

/s/ R. Jan Jennings  
R. Jan Jennings